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January 18, 2024

**Via ECF**

Hon. Naomi Reice Buchwald  
U.S. District Judge  
U.S. District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312


Re: *Margaret Betts v. Sixty Lower East Side, LLC, et al.*,  
Civil Action No.: 1:20-cv-04772

Dear Judge Buchwald:

Attached please find correspondence in response to defense counsel's letter regarding discovery in the above reference matter.

Respectfully submitted,


**NAPOLI SHKOLNIK PLLC**

  
Joseph Napoli, Esq.

cc: Curtis Sobel, Counsel of record (via ECF)

The Court is in receipt of the parties' letters of January 17 and January 18, 2024 regarding expert discovery. See ECF Nos. 89, 91-92. The Court was reminded by reviewing its decision on the motions for summary judgment that plaintiff had requested on April 27, 2021 to stay the expert discovery schedule in this case given the parties' efforts to mediate. Nonetheless, the Court was surprised to learn how little progress had been made on the damages and expert discovery front. Without the provision of a strict and tight schedule to complete discovery, the Court is in no position to set a trial date. Accordingly, the parties are directed to provide a joint weekly update to the Court on the scheduling and progress of the remaining discovery in this case.

**So ordered.**



Dated: January 23, 2024  
New York, New York